

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA

vs.

SONYA PITTMAN

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Criminal Case No. 1:06-cr-170-WHA

MOTION TO CONTINUE

COMES NOW Defendant in the above-styled cause and moves the Court to continue the trial of this matter until the next term of court and in support of which would show the Court as follows:

1. Defendant is presently set to be tried during the February 5, 2007, term of court.
2. Defendant is cooperating with the government and has already attended one proffer meeting with the government's agents and attorneys. As further set forth below, by the end of the date of this motion there will have been two such meetings.
3. This case is expected to result in a guilty plea; however, the AUSA in this case has concluded that more time is required in order to complete cooperation and to work out the terms of a plea agreement.
4. Both sides have worked diligently to effect such a meeting; however, the government agent most responsible for this matter has been out of the District and unable to participate in this process due to the illness of his mother.
5. The agent is now back at work, and will attend a second proffer meeting which has been scheduled for 1:30 p.m. on Wednesday, January 24, 2007, the date of the filing of this motion.

6. It is the undersigned counsel's understanding that the trial of a codefendant, Roy Dale Wallace, also scheduled for February 5th has been continued until the next term, indicating that a continuance for Defendant Pittman would not adversely affect the Court's trial calendar.
7. Both counsel for Defendant and the AUSA believe that it would be in the interest of justice to continue this matter.
8. After consultation, the Assistant U.S. Attorney handling this matter has authorized the undersigned to represent that this motion is unopposed.

WHEREFORE, the premises considered, Defendant prays that the Court will continue the trial of this matter to the next term of court.

RESPECTFULLY SUBMITTED, this __24th__ day of January, 2007.

/s/ JAY LEWIS
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ASB-2014-E66J
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of January, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following parties or counsel:

A. Clark Morris
Office of the United States Attorney
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